

Vote★
Maria
Chappelle~Nadal

RECEIVED
FEDERAL ELECTION
COMMISSION

2016 SEP 26 PM 12: 22

OFFICE OF GENERAL
September 22, 2016

Maria Chappelle-Nadal
Missouri General Assembly
St. Louis County Democrat

Harriett F. Woods Post Office Branch
P.O. Box 300233
University City, MO 63130
www.MariaforMissouri.com
maria.chappellenadal@gmail.com

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Mary Beth deBeau, Paralegal
999 E Street, NW
Washington, DC 20436

Re: Chappelle-Nadal for Congress
MUR 7106

Dear Ms. deBeau:

This is in response to Assistant General Counsel Jeff Jordan's letter of September 6, 2016, addressed to Citizens for Maria Chappelle-Nadal, and the corresponding letter of complaint from Michelle C. Clay dated August 23, 2016, addressed to the FEC General Counsel.

In her August 23, 2016, letter Ms. Clay provides what may be viewed as four new allegations. These allegations concern: (1) Maria Chappelle-Nadal's filing for an unspecified 2020 Missouri State primary, (2) a campaign advertising purchase from Charter Spectrum Reach, (3) a campaign endorsement mailer "endorsing candidates outside her Missouri State Senate district running in the 1st CD," and (4) campaign contributions supporting "at least one of the named candidates" (named in the campaign endorsement mailer).

As before, Ms. Clay merely states bare-bones factual allegations, without citing any statute or regulation she believes has been violated, and without providing any sort of legal argument as to how and why the facts alleged might violate a law or regulation.

It is difficult in such circumstances to respond. Nonetheless, I shall offer brief statements on each of these allegations.

1. Filing for 2020 Primary

The first paragraph of Ms. Clay's August 23, 2016, letter states that State Senator Chappelle-Nadal has "filed with Missouri Ethics Commission as candidate for statewide office for the 2020 primary election, without declaring which specific office is sought."

This is expressly permitted under Missouri election law. RSMo §130.011.1(4) defines "candidate" to include "an individual who seeks nomination or election whether or not the specific

elective public office to be sought has been finally determined by such individual at the time” This applies to State Senator Chappelle-Nadal’s statewide candidate status for the 2020 primary.

A “candidate,” as defined by RSMo §130.011.1(4) may form a “Candidate committee” “to receive contributions or make expenditures in behalf of the person’s candidacy.” RSMo §130.011.1(5). That State Senator Chappelle-Nadal has not yet declared for a specific office is simply irrelevant. She has every right to form a general statewide candidate committee as she has done.

2. Advertising Purchase From Charter Spectrum Reach

The first paragraph of Ms. Clay’s August 23, 2016, letter further states that “the Chappelle-Nadal state Senate campaign account, Citizens for Maria Chappelle-Nadal, contracted with Charter Spectrum Reach for television ads promoting her candidacy in the 1st Congressional District of Missouri race.”

Previously, advertising for Ms. Chappelle-Nadal’s state Senate campaigns had been provided by Charter Spectrum Reach, and billed to her state campaign account. In preparing the invoice Ms. Clay has attached to her letter, Charter Spectrum Reach erroneously addressed it to its previous customer, the state campaign committee Citizens for Maria Chappelle-Nadal. It should have been addressed to the committee for Ms. Chappelle-Nadal’s 1st Congressional District of Missouri race, Chappelle-Nadal for Congress.

Payment was properly made to Charter Spectrum Reach by Chappelle-Nadal for Congress, not by Citizens for Maria Chappelle-Nadal, as reflected by the enclosed copy of a cancelled check and as will be properly disclosed in this committee’s October 15th federal filings.

3. Mailer Endorsing Other Candidates

Ms. Clay’s enclosure of a copy of an endorsement mailer is puzzling. Endorsement of a candidate is fundamental First Amendment protected political speech. Ms. Chappelle-Nadal was simply exercising that right when she publicly endorsed candidates for public office.

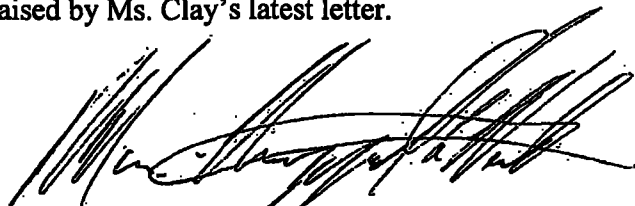
The mailer in question was paid for by funds from the state committee Citizens for Maria Chappelle-Nadal. This committee made no monetary contributions to any of the three candidates endorsed on the mailer. The design, printing and postage for this mailer was an in-kind contribution (as defined in RSMo § 130.011 (18)) by the committee Citizens for Maria Chappelle-Nadal and was reported as such in the 30-Day After Election report to the Missouri Ethics Commission.

4. Contributions from State Senate Candidate Committee to Local Candidates

The second paragraph of Ms. Clay’s letter refers to at least one of the candidates named in the endorsement mailer having received contributions from State Senator Chappelle-Nadal’s state senate campaign committee. As stated above there was no monetary contribution. However, an in-kind expenditure for the mailer was properly reported.

It is unclear how and why Ms. Clay believes this may be unlawful. But under RSMo § 130.034.2(5), contributions to support a candidate for state or local office may be used to contribute to another candidate's campaign committee. Ms. Clay cites no statute or law that would limit such contributions geographically in any manner.

I trust this answers any questions concerning compliance with applicable election law by Maria Chappelle-Nadal for Congress that may have been raised by Ms. Clay's latest letter.

A handwritten signature in black ink, appearing to read 'Maria Chappelle-Nadal', with a stylized, cursive script.

Maria Chappelle-Nadal



U.S. CONGRESS
Maria
CHAPPELLE-NADAL

Chappelle-Nadal for Congress
1st Congressional District
P.O. Box 300254
St. Louis, MO 63130
314.635.VOTE
www.Maria2016.com

OFFICE OF GENERAL
COUNSEL

September 22, 2016

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Office of Complaints Examination & Legal Administration
Attn: Mary Beth deBeau, Paralegal
999 E Street, NW
Washington, DC 20436

Re: Chappelle-Nadal for Congress
MUR 7106

Dear Ms. deBeau:

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This mistake was discovered after payment was made. Payment was properly made to Charter Spectrum Reach by Chappelle-Nadal for Congress, not by Citizens for Maria Chappelle-Nadal, as reflected by the enclosed copy of a cancelled check and as will be properly disclosed in this committee's October 15th federal filings.

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I trust this answers any questions concerning compliance with applicable election law by Maria Chappelle-Nadal for Congress that may have been raised by Ms. Clay's latest letter.

A handwritten signature in black ink, appearing to read "George Lenard", written over the printed name.

George Lenard
Treasurer, Chappelle-Nadal for Congress

/0511/ ROYAL BANKS OF MISSOURI

Document Image

Monday, Sep 19 2016

Check Number 1049
Account Number
Trancode 19-On Us Check

Amount 14,450.00
Sequence Number 80000910
Date 07/28/2016

CHAPPELLE-NADAL FOR CONGRESS
P.O. BOX 300254
UNIVERSITY CITY, MO 63130

Royal Banks
ST. LOUIS, MISSOURI
80-143810

1049

7/25/16

PAY TO THE ORDER OF Chatter \$ 14,450.00

Fourteen Thousand Four Hundred and Fifty DOLLARS

Chatter

MEMO C1A0159533

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ST. LOUIS, MO
2010000224

20160727
ST. LOUIS, MO
2010000224

Royal Banks
of Missouri

The image(s) shown above
represent official copies of
original documents processed
by our institution.



July 25, 2016

Chappelle-Nadal for Congress
PO Box 300254
University City, MO 63130

RE: PAYMENT RECEIVED

Thank you for your recent payment. Check # 1049 in the amount of \$14,450.00 was received by our office on July 25, 2016.

If you have any questions or concerns, please do not hesitate to contact us.

Sincerely,

Jessica Gerrein
Media Billing Coordinator
Office: 314.394.2429
Fax: 314.394.2577
E-mail: jessica.gerrein@charter.com

From: Masker, Sue
Sent: Sunday, July 24, 2016 1:58 PM
To: Maria Chappelle-Nadal
Subject: Revised scheduled(s)
Importance: High

Hi Maria,

Finished both schedules. I went through and pulled all rankers from our Nielson data to see what the AA 25+ networks and times they are watching so we could maximize your investment. Where you see networks with the time frame 9a-12m, these had viewing throughout the day with really nice ratings across the board.

One schedule is just the original three zones and the other is the three zones with ATT added in. The amount of both schedules is \$17K gross. Please remember you still have your 15% off of this \$17K.

Give me a shout a shout with any questions.

Sue



Sue Masker
Account Executive

1650 Des Peres Rd. Suite 300. St. Louis MO 63131

P 314.394.2552 | C 314.596.1513 | SpectrumReach.com | [LinkedIn](#)

Maria \$17K with ATT															
Sched Dates	7/26/16 - 8/2/16														
All-Wks Avg															
	Notes	Rate \$	Unit/ Wk	Unit Tot	DP Code	Src	Start Date	End Date	Day 2 Tue 7/26 '16	Day 3 Wed 7/27 '16	Day 4 Thu 7/28 '16	Day 5 Fri 7/29 '16	Day 6 Sat 7/30 '16	Day 7 Sun 7/31 '16	Day 8 Mon 8/1 '16
Total		\$17001.00		1119					146	157	157	157	150	150	150
	St. Louis Jul15 C-DNA Nielsen Live+7	\$17001.00		1119					146	157	157	157	150	150	150
	3370, Florissant-North County, MO	\$4193.00		305					40	43	43	43	40	40	40
	CNN -TV	\$934.00		22					3	3	3	3	3	3	3
	M-Su 5a-9a	\$24.00	4	8	EM	TP			1	1	1	1	1	1	1
	M-Su 3p-7p	\$48.00	4	7	ROS	TP			1	1	1	1	1	1	1
	M-Su 7p-12m	\$58.00	4	7	PT	TP			1	1	1	1	1	1	1
	CNBC-TV	\$448.00		32					4	4	4	4	4	4	4
	M-Su 5a-9a	\$14.00	8	16	EM	TP			2	2	2	2	2	2	2
	M-Su 9a-3p	\$14.00	8	16	DT	TP			2	2	2	2	2	2	2
	HLN -TV	\$334.00		58					7	9	9	9	7	7	7
	M-Su 5a-9a	\$4.00	8	16	EM	TP			2	2	2	2	2	2	2
	M-Su 9a-3p	\$4.00	4	8	DT	TP			1	1	1	1	1	1	1
	M-Su 3p-7p	\$6.00	9	17	ROS	TP			2	3	3	3	2	2	2
	M-Su 7p-12m	\$8.00	9	17	PT	TP			2	3	3	3	2	2	2
	MNBC-TV	\$1300.00		71					10	10	10	10	9	9	9
	M-Su 5a-9a	\$14.00	8	16	EM	TP			2	2	2	2	2	2	2
	M-Su 9a-3p	\$14.00	8	16	DT	TP			2	2	2	2	2	2	2
	M-Su 3p-7p	\$20.00	11	21	ROS	TP			3	3	3	3	3	3	3
	M-Su 7p-12m	\$24.00	9	18	PT	TP			3	3	3	3	2	2	2
	BET -TV	\$440.00		46					6	6	6	6	6	6	6
	M-Su 9a-3p	\$7.00	8	16	DT	TP			2	2	2	2	2	2	2
	M-Su 3p-7p	\$10.00	8	16	ROS	TP			2	2	2	2	2	2	2
	M-Su 7p-12m	\$12.00	7	14	PT	TP			2	2	2	2	2	2	2

Sched Dates	7/26/16 - 8/2/16																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
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